



AMERITECH INCIDENT REPORT

Order Identification	
Customer Name:	[REDACTED] Order #:
Telephone #:	[REDACTED]
Customer Address:	[REDACTED]

Brief Description of Problem:	
<p>The cut was to take place on 12/20/96 per the customer, and we did have confirmation from AMI on this also. We were told two (2) days before the cut by AMI that they did not have enough facilities to do the cut and they may not be ready by the 20th.</p> <p>Later, we found that the address for the new location was not correct (it was across the street from the original new address) but the AMI tech said this was not a problem and they will still be able to cut on the 20th.</p> <p>Once again, we found out from the AMI tech. that there were not enough facilities at the new location to do the cut. AMI said they would not have a tech to do the cut on the 20th; but the cut ended up going on the 23rd after we approved the overtime for AMI.</p>	
Order Date: 12/5/96	Inservice Date: 12/23/96
Reporter's Name:	Reporting Dept:



Order Identification

Customer Name:

Order #

Telephone #:

Customer Address:

Brief Description of Problem:

Originally, Ameritech claimed that there was existing facilities which we were unable to locate so we decided to install a new loop and then proceed with a cross-connect. When we put the cross-connect order through to AMI they informed us that it wasn't necessary to take this action because there wasn't an active line at this location.

Order Date: 10/3/96

Inservice Date: 10/14/96

Reporter's Name:

Reporting Depts



9

Brief Description of Problem:

[REDACTED]

"I talked with a provisioner from Ameritech today and they will leave the OPX line for [REDACTED] one. They basically said in this instance the OPX line is tied to a "station" and not a phone number and therefore can stay as is. The problem is still not rectified, however.

Ameritech is saying we have two choices: (1) either pay for a redesign of any future line based OPX circuit, \$700-\$1500, or (2) keep one dial tone circuit with Ameritech for any future customer with a line based OPX line (it evidently doesn't matter which number as long as one stays)

This justifies what I had been telling them all along—the OPX circuit physically has NOTHING to do with the phone number. This may be a temporary solution but I would still [would] like to have the ability to take all the customer lines we can and not make the billing issue any more difficult for the customer than we have to."

Order Date: [REDACTED] Inservice Date: [REDACTED]
Reporter's Name: [REDACTED] Reporting Dept: [REDACTED]



Order Identification	
Customer Name:	Order #
Telephone #:	
Customer Address:	

The customer has an OPX. We wanted Ameritech to miscellaneous bill the OPX. Ameritech refused. We put the order on hold to await a decision.

Ameritech then started to work the order after the order was put on hold. The customer had two numbers that went down. Ameritech got one of the numbers back up the same day but the other number was still down three days later.

The order is still on hold pending a decision on the OPX issue.

Order Date:	Inservice Date: Pending
Reporter's Name:	Reporting Dept:



AMERITECH INCIDENT REPORT

Order Identification
Customer Name: [REDACTED] Order # [REDACTED]
Telephone #: [REDACTED]
Customer Address: [REDACTED]

Brief Description of Problem:
CUSTOMER CALLED AMI TO ADD CALL FORWARD/FIXED TO THE LAST LINE OF THEIR HUNT GROUP, WHICH IS CURRENTLY WITH AMI BUT AN ORDER IS PENDING TO SWITCH THESE LINES OVER TO BROOKS. THE AMI REPRESENTATIVE TOLD THE CUSTOMER THAT HIS REQUEST WAS NOT POSSIBLE BECAUSE OF THE TYPE OF SOFTWARE AMI USES. ALL THE CUSTOMER WANTED TO DO WAS SIMPLY HAVE THE LAST LINE OF THEIR HUNT GROUP TO CALL FORWARD TO ONE OF THEIR BROOKS NUMBERS THAT'S ALREADY UP & RUNNING ON BROOKS. THIS CUSTOMER SHOULD BE ABLE TO ADD CALL FORWARDING TO ANY NUMBER THEY CHOOSE. WE ADVISED THE CUSTOMER TO CALL AMI BACK AND ADD CALL FORWARD/VARIABLE TO THE LAST LINE SO THAT THEY COULD DO THE PROGRAMMING THEMSELVES.
Order Date: _____ Issuing Date: _____

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Commission's Own)
Motion to consider Ameritech Michigan's)
Compliance with the Competitive Checklist in)
Section 271 of Telecommunications Act of 1996)

Case No. U-11104

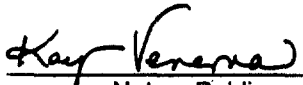
PROOF OF SERVICE

STATE OF MICHIGAN)
) ss
COUNTY OF KENT)

The undersigned, being duly sworn, deposes and says that on the 17th day of January 1997, he served a copy of the attached document to the parties listed below via First Class U.S. Mail postage prepaid.


Todd J. Stein (P44159)

Subscribed and sworn to before me this
17th day of January 1997.


Kay Venema, Notary Public
Kent County
Commission Expires 9/7/99

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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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Motion to consider Ameritech Michigan's)
Compliance with the Competitive Checklist in)
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Case No. U-11104

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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Commission's Own)
Motion to consider Ameritech Michigan's)
Compliance with the Competitive Checklist in)
Section 271 of Telecommunications Act of 1996)

Case No. U-11104

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STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Commission's Own)
Motion to consider Ameritech Michigan's)
Compliance with the Competitive Checklist in)
Section 271 of Telecommunications Act of 1996)

Case No. U-11104

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January 24, 1997

MICHIGAN PUBLIC SERVICE
FILED

JAN 27 1997

COMMISSION

Ms. Dorothy Wideman
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Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Re: MPSC Case No. U-11104

Dear Ms. Wideman:

Enclosed for filing in the above-referenced case is the original proof of service for Ameritech Michigan's Submission as Required by the Commission's December 12, 1996 Order Initiating This Proceeding filed with the Commission on January 21, 1997.

Very truly yours,

Craig A. Anderson
f

Enclosure

CAA:jkt

In the matter, on the Commission's own motion, to consider the total service long run incremental costs and to determine the prices of unbundled network elements, interconnection services, resold services, and basic local exchange services for AMERITECH MICHIGAN.

MICHIGAN PUBLIC SERVICE
FILED

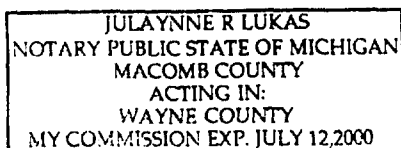
COMMISSION

STATE OF MICHIGAN)
) SS.
COUNTY OF WAYNE)

Further, deponent sayeth not.

Jacqueline K. Tinney
JACQUELINE K. TINNEY

Julianne R. Lukas



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The logo for Ameritech, featuring the word "Ameritech" in a serif font, with a stylized swoosh underline that starts under the 'A' and ends under the 'h'.

January 24, 1997

MICHIGAN PUBLIC SERVICE
FILED

JAN 28 1997

COMMISSION

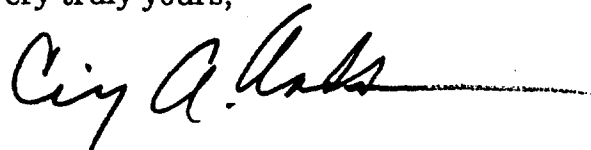
Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way, P.O. Box 30221
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Re: MPSC Case No. U-11104

Dear Ms. Wideman:

Enclosed for filing is the original Proof of Service indicating service of Ameritech Michigan's Second Supplemental Information Filing upon the parties listed on the attached service list.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Craig A. Anderson", followed by a horizontal line.

Craig A. Anderson

CAA/jrl
Enclosure

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,
to consider Ameritech Michigan's compliance
with the competitive checklist in Section 271
of the Telecommunications Act of 1996.

Case No. U-11104

MICHIGAN PUBLIC SERVICE
FILED

PROOF OF SERVICE

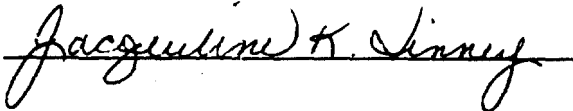
JAN 28 1997

Julaynne R. Lukas, being first duly sworn, deposes and states that on the 24th day of January 1997, she served a copy of Ameritech Michigan's Second Supplemental Information Filing upon the parties listed on the attached service list via United States Mail.

Further, deponent sayeth not.


Julaynne R. Lukas

Subscribed and sworn to before me
this 24th day of January, 1997.



JACQUELINE K. TINNEY
Notary Public, Wayne County MI
My Commission Expires July 17 1998

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MPSC CASE NO. U-11104

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January 30, 1997

Ms. Dorothy Wideman
Executive Secretary
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MICHIGAN PUBLIC SERVICE
FILED

JAN 30 1997

COMMISSION

Re: MPSC Case No. U-11104

Dear Ms. Wideman:

Enclosed for filing in the above-captioned matter, are an original and 15 copies of Michigan Cable Telecommunications Association's Reply to Ameritech Michigan's Supplemental Information Filed on January 16, 1997, along with Proof of Service of same.

Very truly yours,

Fraser Trebilcock Davis & Foster, P.C.



Michael S. Ashton

MSA/maf
Enclosures

cc: All Counsel of Record

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,
to consider Ameritech Michigan's compliance
with the competitive checklist in Section 271
of the Telecommunications Act of 1996.

Case No. U-11104

THE MICHIGAN CABLE TELECOMMUNICATIONS ASSOCIATION'S
REPLY TO AMERITECH MICHIGAN'S
SUPPLEMENTAL INFORMATION
FILED ON JANUARY 16, 1997

MICHIGAN PUBLIC SERVICE
FILED

JAN 30 1997

COMMISSION

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Date: January 30, 1997

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TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	AMERITECH MICHIGAN IS NOT PROVIDING ACCESS TO ITS POLES AT JUST AND REASONABLE RATES	2
A.	Ameritech Michigan Concedes That The FCC Pricing Methodology Is The Appropriate Methodology To Determine Its Compliance With The Competitive Checklist	2
B.	Ameritech Has Failed To Produce Any Workpaper To Support Its \$1.97 Rate	3
C.	Ameritech Michigan Offers No Criticism Of MCTA's Workpaper Which Establishes A Maximum Allowable Pole Rate Of \$1.20	3
D.	Ameritech Michigan Seeks To Impose A Pole Rate Which Includes Ameritech Michigan's Pole Rent Paid To Attach Its Wires To Poles Owned By Other Utilities	3
E.	Ameritech Michigan Does Not Dispute That It Duns Attaching Parties Based On Excessive Rates	4
F.	Ameritech's Pole Rate Is Unjust And Unreasonable Because It Violates Michigan Law	5
III.	CONCLUSION	5

I. INTRODUCTION

The Michigan Cable Telecommunications Association ("MCTA") files this brief reply to the Supplemental Information filed by Ameritech Michigan on January 16, 1997. In its reply, MCTA will not attempt to respond to each and every argument which Ameritech Michigan raised in an effort to obfuscate the record in this case. The purpose of this reply is simply to demonstrate beyond dispute that Ameritech Michigan is not in compliance with the competitive checklist because it has failed to provide access to its poles at just and reasonable rates as required by Section 271(c)(2)(B)(iii) of the Communications Act of 1934, as amended, being 47 USC § 271(c)(2)(B)(iii).

While Ameritech Michigan's original filing in this docket summarily asserted that Ameritech had "followed the FCC pricing methodologies based on Section 224(d) and the FCC rules and formulas found in Docket No. 86-212 dated July 23, 1987 (poles),"¹ Ameritech Michigan has failed to provide any evidence to support its claim. Indeed, Ameritech had not even submitted a workpaper showing how it calculated its \$1.97 rate. By contrast, MCTA has submitted a workpaper which correctly utilizes the applicable methodology and establishes a maximum allowable pole rate of \$1.20. With respect to MCTA's workpaper, Ameritech Michigan offers not one single substantive criticism, whatsoever. In addition, Ameritech Michigan does not even attempt to refute the fact that in imposing its \$1.97 pole rate, Ameritech Michigan is seeking to recover from attaching parties the pole rents which Ameritech Michigan pays to attach its own wires to the poles owned by other utilities! Finally, rather than admit that it is improper to continue to dun

FRASER
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STER, P.C.
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48933

¹Ameritech Michigan's Attachment B, MPSC Case No. U-11104, filed December 16, 1996, at p 15.

attaching parties at a \$2.88 rate which the MPSC rejected and which Ameritech Michigan itself withdrew, Ameritech Michigan makes a veiled threat to impose an even more excessive rate because of the complaint made in this proceeding to the Commission.

II. AMERITECH MICHIGAN IS NOT PROVIDING ACCESS TO ITS POLES AT JUST AND REASONABLE RATES

A. Ameritech Michigan Concedes That The FCC Pricing Methodology Is The Appropriate Methodology To Determine Its Compliance With The Competitive Checklist

As set forth in greater detail in MCTA's January 9, 1997 filing in this case, the FCC pricing methodology has been adopted by Section 361 of the Michigan Telecommunications Act, being MCL 484.2361; MSA 22.1469(361). Thus, Ameritech is required to set its pole rate based on this methodology in order to be in compliance with the competitive checklist.

Ameritech Michigan has conceded that the FCC pricing methodology is the appropriate pricing methodology to determine its compliance with the competitive checklist. In response to a Commission question regarding the pricing methodology and prices for access to poles, ducts, conduits, and rights-of-way, Ameritech Michigan stated:

"c. What are the pricing methodology and prices for access to poles, ducts, conduits, and rights of way? Be specific.

RESPONSE

Ameritech Michigan has applied the FCC's pricing methodologies based on Section 224(d) and the FCC's rules and formulas found in Docket No. 86-212 dated July 23, 1987 (poles) and Docket No. 96-181, dated September 3, 1996 (conduit). Pricing under the FCC methodology is included in Ameritech Michigan's filed tariff." (Ameritech Michigan's Response to Attachment B, MPSC Case No. U-11104, December 16, 1996, at p 15.)

Thus, there is no dispute regarding the methodology which should be utilized to calculate Ameritech's pole attachment rate.

B. Ameritech Has Failed To Produce Any Workpaper To Support Its \$1.97 Rate

Ameritech Michigan has made numerous and lengthy filings with the Commission in this case, including its filings on December 16, 1996 and January 16, 1997. Despite those voluminous filings, Ameritech Michigan has failed to produce any workpaper to explain or support its \$1.97 pole rate. The apparent reason why Ameritech Michigan has been unwilling to file a workpaper is because its rate was not correctly calculated in conformance with the applicable methodology.

C. Ameritech Michigan Offers No Criticism Of MCTA's Workpaper Which Establishes A Maximum Allowable Pole Rate Of \$1.20

In its January 9, 1997 filing, MCTA set forth in precise detail an analysis of the maximum allowable pole rate for Ameritech Michigan. This analysis established that, based on Ameritech's publicly filed cost data, the maximum allowable pole rate was \$1.20 per pole per year. Despite its best efforts to obfuscate the record in its supplemental filing on January 16, 1997, Ameritech Michigan offers not one substantive criticism of the manner in which MCTA applied the pole rate methodology which Ameritech Michigan, itself, conceded was appropriate.

D. Ameritech Michigan Seeks To Impose A Pole Rate Which Includes Ameritech Michigan's Pole Rent Paid To Attach Its Wires To Poles Owned By Other Utilities

In fact, Ameritech Michigan does not even dispute the fact set forth in MCTA's January 9, 1997 filing that the primary difference between Ameritech Michigan's pole rate of \$1.97 and MCTA's calculation of a maximum allowable pole rate of \$1.20 is that